



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*50 Main Street, Suite 1100
White Plains, New York 10606*

July 5, 2024

By ECF and EMAIL

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

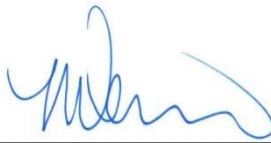
Re: *United States v. Jahreek Bush*, 23 Cr. 545 (KMK)

Dear Judge Karas:

The Government writes respectfully to request that the Court enter the attached proposed protective order.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: 
Margaret N. Vasu
Benjamin L. Levander
Assistant United States Attorneys
(914) 993-1926 / -1930

cc: Theodore S. Green, Esq. (by ECF and Email)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JAHREEK BUSH,

Defendant.

[PROPOSED] Protective Order

23 Cr. 545 (KMK)

Upon the application of the United States of America, Damian Williams, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Margaret Vasu and Benjamin Levander, of counsel, for an order precluding the dissemination of certain materials produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972), with the consent of the defendant, and for good cause shown, it is hereby ORDERED that:

1. Defense counsel must destroy or return to the Government all § 3500 and *Giglio* material and any copies thereof for all non-expert Government witnesses (the “3500 Material”) at the later of either the conclusion of the trial of this matter or when any appeal has become final.
2. The defense is prohibited from disseminating any of the 3500 Material and any copies thereof to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense, except during Court proceedings at trial.
3. Certain 3500 Materials in this case raise a more significant risk of affecting the privacy or safety of victims or witnesses, or the confidentiality of ongoing investigations. 3500 Material produced by the Government to the defendant or his counsel that is either (1) designated in whole or in part as “Attorney’s Eyes Only” by the Government in emails or communications to defense counsel, or (2) that includes a Bates or other label stating “Attorney’s Eyes Only” or

“AEO” shall be deemed “AEO Material.” AEO Material received by defense counsel shall be maintained on an attorney’s eyes only basis, and the defense shall not share any AEO Material or the content of the AEO Material with any other persons, including the defendant, except for any personnel for whose conduct defense counsel is responsible. AEO Material pertinent to any motion before the Court should initially be filed under seal, absent consent of the Government or Order of the Court

Dated: White Plains, New York

July 8, 2024



THE HONORABLE KENNETH M. KARAS
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK